

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

<p>N.E. VERNICOS – ARGONAFIS SALVAGE AND TOWAGE CONSORTIUM; ARGONAFIS NAFTIKI ETAIRIA, et al.; Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>OCEAN TANKERS HOLDINGS PUBLIC COMPANY LIMITED, et. al.; Defendants</p> <p style="text-align: center;">and</p> <p>XIFIAS NAVIGATION LIMITED, Plaintiff,</p> <p style="text-align: center;">v.</p> <p>OCEAN TANKERS HOLDINGS PUBLIC COMPANY LIMITED, et al. Defendants.</p>	<p>(ADMIRALTY)</p> <p>1:10-cv-0441 (ML)</p> <p>c/w</p> <p>1:10-cv-0451 (ML)</p>
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**OBJECTION TO ROYAL BANK OF SCOTLAND’S MOTION TO SEAL**

NOW COME, Plaintiffs N.E. VERNICOS – ARGONAFIS SALVAGE AND TOWAGE CONSORTIUM; ARGONAFIS NAFTIKI ETAIRIA and hereby submit their Objection to the Royal Bank of Scotland’s Motion to Seal. Plaintiffs have also prepared a Memorandum of Law in Opposition to the ROYAL BANK OF SCOTLAND’s (“RBS”) Motion to Seal. However, pursuant to LR Gen 102(b)(2), and despite their disagreement with RBS’s position, Plaintiffs have good reason to believe

that their filing contains material that RBS would maintain is confidential.<sup>1</sup> In addition, Plaintiffs are cognizant that the Court restricted access to the previously filed documents to the parties. Accordingly, pursuant to LR Gen 102(b)(2), Plaintiffs will, on the same day of this filing, provide counsel for all parties of record (via email) and the Court (via regular mail) their Memorandum of Law in Opposition prior to filing same with the Court in the public domain. This will allow RBS the opportunity to file a motion to seal that document.

Date: March 21, 2010

Respectfully Submitted,

N.E. VERNICOS – ARGONAFITIS  
SALVAGE AND TOWAGE  
CONSORTIUM and ARGONAFITIS  
NAFTIKI ETAIRIA,

By Its Attorneys,

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<sup>1</sup> Plaintiffs do note, for the sake of good order, that RBS has waived any ability to seal the documents as they utterly failed to follow the procedure set forth for sealing documents in LR Gen 102(b)(1).

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of March, 2011 a copy of the foregoing was electronically filed with the Clerk of the United States District Court for the District of Rhode Island and is available for viewing and downloading to all ECF registered counsel of record in this matter.

/s/ Howard Merten  
Howard Merten